

Hon. Ronald B. Leighton

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

ROBERT A. SHOBERG,

Plaintiff,

vs.

GRAYS HARBOR COUNTY, et al,

Defendants.

No. 3:18-cv-06009-RBL

STIPULATED MOTION TO LIFT  
STAY OF PROCEEDING, AND  
[PROPOSED] ORDER

NOTE ON MOTION CALENDAR:  
January 9, 2020

I. RELIEF REQUESTED

COME NOW the parties to this action, by and through counsel of record, and hereby file this stipulated motion pursuant to LCR 10(g) and LCR 7(d)(1) seeking an order lifting the stay of this proceeding.

II. GROUNDS FOR LIFTING OF STAY

Since entry and filing of the Stipulated Motion to Stay Proceeding, and Order in this matter (Dkt. 11), the parties have been unsuccessful in their attempts to resolve the property forfeiture claims, and plaintiff intends to pursue his federal claims. The parties therefore now seek an order lifting the stay of this proceeding.

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STIPULATED MOTION TO LIFT STAY OF  
PROCEEDING, AND [PROPOSED] ORDER – 1

Cause No.: 3:18-cv-06009-RBL

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**III. CONCLUSION**

For the reasons set forth above, the parties respectfully request that the Court enter an order lifting the stay in this proceeding, allowing the case to proceed in the normal course of events for civil matters in this Court.

Dated this 9<sup>th</sup> day of January, 2020.

LAW, LYMAN, DANIEL,  
KAMERRER & BOGDANOVICH, P.S.

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Attorney for Plaintiff

**[PROPOSED] ORDER**

Having considered the Stipulated Motion above, the Court hereby orders that the stay entered and filed in this matter (Dkt. 11) is hereby lifted, and the case shall hereafter proceed in the normal course of events for civil matters in this Court.

**IT IS SO ORDERED.**

DATED this \_\_\_\_\_ day of January, 2020.

\_\_\_\_\_  
Ronald B. Leighton  
United States District Judge

Presented by:

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**STIPULATED MOTION TO LIFT STAY OF  
PROCEEDING, AND [PROPOSED] ORDER – 3**

**Cause No.: 3:18-cv-06009-RBL**

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Attorney for Plaintiff

### CERTIFICATE OF SERVICE

I certify, under penalty of perjury, under the laws of the United States of America and the State of Washington that on the date specified below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system who will deliver the same to the parties as follows:

Plaintiff:

Scott A. Campbell, [scott@graysharborattorney.com](mailto:scott@graysharborattorney.com)

Defendants' Co-Counsel:

Jennifer L. Wieland, [jwieland@co.grays-harbor.wa.us](mailto:jwieland@co.grays-harbor.wa.us)

Dated this 9<sup>th</sup> day of January, 2020 at Tumwater, Washington.

/s/Lisa Gates  
Lisa Gates  
Legal Assistant to Guy Bogdanovich